



CTIA

Building The Wireless Future™

Cellular Telecommunications & Internet Association

Thomas E. Wheeler

President/CEO

February 12, 2002

Ms. Helen Mickiewicz
Deputy General Counsel
State of California
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Ms. Mickiewicz:

Your February 5, 2002, letter takes me to task for noting the concerns you expressed over the aggressive national rollout of number pooling. At issue is my reference in a letter to Mr. William Nugent, the Chairman of the National Association of Regulatory Commissioners (NARUC), citing your advice to the FCC that: "[placing] more than one NPA per month into pooling could be a burden on the carriers. That, in turn, could result in problems that might affect service quality, or even call completion."

In your letter to me, you stress that the quote pertains only to the number of area codes included in the first quarter of the proposed rollout schedule, and that nothing in the CPUC pleading refers to wireless number pooling. Fair enough, you wrote the pleading and I must accept your intent. Apparently you did not appreciate how your persuasive observation was right on target. Your letter's observation that the CPUC can identify "no connection between the number of area codes pooled per quarter and the beginning of wireless pooling" reinforces exactly the regulatory concern my letter was attempting to point out and that I thought your pleading indicated you understood. Please hear me out

First, I want to repeat that we are in strong agreement regarding the importance of implementing thousand-block number pooling on the schedule the FCC has set for the wireless industry. The FCC's most recent Numbering Resource Utilization Report confirms that cellular and PCS carriers are nearly as efficient in their use of numbering resources as the ILECs, and far more efficient than CLECs and paging carriers (even though wireless carriers have not participated in the states' number pooling trials for LNP-capable carriers). We recognize the wireless industry has an important obligation to insure the efficient utilization of scarce numbering resources, and we are working hard to become pooling-capable and eliminate the rationale for state rationing of the numbers we need to meet consumers' demand for wireless service.

The CPUC comments, as explained by you, make the fatal error of looking at the wireline network in a vacuum. The wireline and wireless networks are part of a single Public Switched Telephone Network (PSTN), and all carriers share the same architecture and resources needed to route calls in a pooling environment. As we all know, service-affecting problems can arise anywhere in the PSTN and cascade throughout the entire network. This means it impossible to consider only one part of the PSTN when service quality and call completion are at risk.



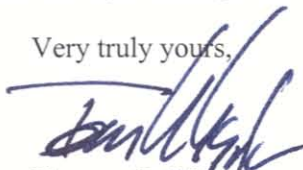
I referenced your concerns regarding the risks associated with converting more than one area code a month to wireline number pooling to highlight your very valid point about the fragility of the PSTN – a point that becomes even more important if wireless is added to the equation. Your comments underscore the risks associated with a carefully controlled roll-out of number pooling long after the wireline carriers have introduced number porting. My point, and the connection you are seeking “between the number of area codes pooled per quarter and the beginning of wireless pooling,” is simply that requiring wireless carriers to simultaneously begin pooling *and* porting on November 24, 2002, presents much greater risks to the PSTN than adding one more area code a quarter to the wireline roll-out of number pooling.

It is not enough to assume, as you suggest, that when wireless carriers begin pooling, the national rollout will already be in the “3rd Quarter” and network concerns are somehow minimized. On November 24, 2002, wireless carriers must both “catch up” to wireline carriers in more than 150 NPAs *and* join the on-going national rollout schedule for the remaining area codes. And that’s just for pooling. As you know, the FCC mandate also requires wireless carriers to be ready to implement number porting on the same day, and wireless porting volumes are expected to be double wireline volumes. This is an invitation to “problems that might affect service quality, or even call completion.”

The risks identified in your comments are multiplied when applied to the wireless implementation requirements. Recognition of these risks is critical to understanding the very real threats to the quality of service and call completion in California and throughout the country posed by the FCC’s current implementation schedule for wireless carriers. Simply put, the simultaneous cutover of both pooling and porting will strain the resources of wireless carriers and the PSTN, and will make the concerns expressed in your pleading regarding the first quarter of 2002 come true in November of this year. That is why CTIA advocates separating wireless pooling from porting – because such an approach limits “problems that might affect service quality, or even call completion.”

The wireless industry’s commitment to participate in number pooling is steadfast. While we support the timely implementation of wireless number pooling to assure efficient number utilization, CTIA believes it is unwise to support the simultaneous implementation of both wireless number pooling and wireless number porting. I recognize that you may disagree, but I believe your warning about imprudent regulation’s risks to the PSTN are right on target for both wireless and wireline services.

Very truly yours,



Thomas E. Wheeler